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VIA ECF

Hon. James Donato
United States District Judge
U.S. District Court, Northern District of California
Courtroom 11
450 Golden Gate Avenue
San Francisco, CA 94102

Re: Gor Gevorkyan v. Bitmain, Inc., et al., N.D. Cal. Case No. 3:18-cv-07004-JD

Dear Judge Donato:

Defendant Bitmain Technologies Ltd. ("Bitmain") objects to Plaintiff's procedurally improper letter motion for a further extension of the period for jurisdictional discovery (ECF 59)—which also effectively constitutes an unauthorized reply in support of his motion to compel (ECF 56), filed without leave of court. Plaintiff did not meet and confer with Defendant before filing his motion, and he does not contend otherwise. Should the Court nonetheless choose to consider Plaintiff's motion on its merits, Bitmain respectfully requests an opportunity to respond to Plaintiff's multiple misstatements of fact concerning the completeness of Bitmain's discovery responses, the volume of documents Bitmain has produced to date, and Plaintiff's own clear lack of diligence.

Respectfully yours,

A handwritten signature in blue ink, appearing to be 'CLazatin', followed by a horizontal line.

Carlos M. Lazatin
of O'Melveny & Myers LLP